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MEMO ENDORSED

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January 17, 2025

BY ECF

Honorable Colleen McMahon
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Harry v. City of New York et al.
24-CV-8274 (CM)

Your Honor:

I am a Senior Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, and the attorney for Defendant City of New York, in the above-referenced case.¹ I write on behalf of Defendant City to respectfully request that the Court adjourn the Initial Conference currently scheduled for January 23, 2025, at 10:15 am. This is Defendants' first request for an adjournment. Plaintiff consents to the instant request.

By way of background, on October 30, 2024, Plaintiff filed the instant matter alleging, *inter alia*, denial of a right to a fair trial, malicious prosecution, false arrest, and excessive force, and various state law claims. *See* ECF No. 1. On November 1, 2024, the Defendant City was served and its answer is due January 21, 2025. *See* ECF No. 9. On December 2, 2024, the initial conference was rescheduled for January 23, 2025. *See* ECF No. 35. Prior to the conference, the parties were also ordered to confer and submit a Case Management Plan pursuant to Your Honor's Individual Rules.

At this time, Defendant respectfully requests an adjournment of the Initial Conference as undersigned counsel, will be out of the office from January 21, 2025, through

OK, extension granted.
Conference rescheduled to
Thursday, January 30, at 10:00am.

Colleen McMahon
1/22/2025

¹ This case has been assigned to Assistant Corporation Counsel Jessica Ochoa. Ms. Ochoa is a member in good standing with the New York State Bar (No. 6124655) as well as admitted to practice before the U.S. District Courts of the District of Columbia (No. 1736588) and Maryland (No. 30564). She is currently in the process of being admitted to practice before the present court. Ms. Ochoa may be reached directly at (212) 356-3159.

January 28, 2025. As such, counsel will also be unavailable to confer with Plaintiff's counsel regarding the Case Management Plan prior to the Initial Conference.

Accordingly, Defendants respectfully request that the Court adjourn the Initial Conference on January 23, 2025, as well as any relevant deadlines to a date after January 28, 2025.

Defendants thank the Court for its time and consideration of these requests.

Respectfully submitted,

/s/ Elissa Jacobs
Elissa Jacobs
Senior Counsel
Special Federal Litigation Division

cc: **BY ECF**
MK Kaishian, Esq.
Counsel for Plaintiff